

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AMERICAN BOARD OF SURGERY, INC. : CIVIL ACTION

Plaintiff, : NO. 10-1857

v. :

KEITH A. LASKO and AMERICAN :

BOARD OF GENERAL SURGERY :

Defendants. :

**FILED**

JUL 19 2010

MICHAEL E. KUNZ, Clerk  
By: [Signature] Dep. Clerk

MOTION FOR CHANGE OF VENUE

1- The American Board of General Surgery Is a Nevada Corporation and operates under Nevada Laws that are very different from non-Nevada corporations. For example, a Nevada Corporation, unlike in other states, does not hold officers and directors responsible for the debts and financial obligations of a Nevada Corporation. This important fact is completely ignored by the paintiff and in seeking money from Reverend Doctor Keith A Lasko, plaintiff is violating Nevada Corporate Law. A proceeding in the state of Nevada would be likely to point out the Nevada Laws Governing Corporations and avoid violating Nevada Corporation Rights and important laws governing Nevada Corporations, and would avoid the plaintiff violating the Rights of Reverend Doctor Keith A Lasko as an Officer of a Nevada Corporation.

2-Plaintiff is asking for a great deal of money and therefore the Rights of the Nevada Corporation and of Reverend Doctor Keith A Lasko as an Officer of a Nevada Corporation, should have the full benefit of legal protections of the Law respecting Nevada Corporations and Officers of Nevada Corporations.

3-Reverend Doctor Keith A Lasko has a severe medical condition called malignant arterial hypertension and has sustained previous heart attacks, this has resulted in great difficulty for him to travel and places a

severe hardship upon him in that the present proceedings in Philadelphia, many thousands of miles from Lasko's home in Nevada, makes it extremely difficult for him to come to a court in Philadelphia to defend himself and this severely prejudices his ability to defend himself.

4-Keith A Lasko is a retired medical doctor and an ordained reverend who has given everything to his Ministry of promoting Christian humanitarian values and traditional Christian family values in all aspects of Medicine. This has resulted in a state of relative poverty in which it is difficult for him to find or pay for a lawyer or pay for travel to and from Philadelphia from Nevada, a circumstance that is prejudicial to him and greatly favors the plaintiff who can practically stroll to the courtroom. This severely prejudices the outcome of this case in great favor of the plaintiff.

5-Witnesses and evidence available to Lasko in Nevada are not easily available to him in Philadelphia and the financial distress of Lasko further prejudices the case against Lasko if the courtroom is in Philadelphia, where the plaintiff has tremendous financial resources and numerous witnesses readily available that Lasko cannot begin to equal, and strongly prejudices the case against Lasko, should the case go on in Philadelphia.

6-The plaintiff has a strong relationship with lawfirms in Philadelphia, Lasko does not have either a lawyer in Philadelphia or familiarity with the law firms in Philadelphia, this gives plaintiff an overwhelming advantage in a court case in Philadelphia, and is extremely prejudicial in favor of the plaintiff and against Lasko.

For all of the above reasons, in the interest of fairness and to avoid prejudice, it is hereby requested and prayed that a change of venue be granted and the case moved to the Federal Court in Las Vegas, Nevada, where Lasko resides and can better defend himself and where the Corporation, the American Board of General Surgery, can better preserve its rights as a Corporation and the Rights of its Officers.



Reverend Doctor Keith A. Lasko, M.D., Doctor of Divinity (Hon.)

First Church of the Epiphany

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Date: July 13, 2010